

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:	:	CHAPTER 13
GEORGE HENRY SIMEONE	:	
fdba George Simeone's 100 Hour Mega	:	CASE NO. 1:17-bk-04682
Sale	:	
Debtor(s)	:	
	:	
Specialized Loan Servicing LLC, as	:	
servicer for The Bank of New York	:	
Mellon FKA The Bank of New York, as	:	
Trustee for the certificateholders of the	:	
CWABS, Inc., ASSET-BACKED	:	
CERTIFICATES, SERIES 2006-18	:	
Movant	:	
	:	
GEORGE HENRY SIMEONE	:	
fdba George Simeone's 100 Hour Mega	:	
Sale	:	
Respondent	:	

ANSWER TO MOTION FOR RELIEF FROM STAY

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted that documents were filed with the Bankruptcy Court; however, this paragraph paraphrases portions of documents, which are attached as exhibits to the Motion and which speak for themselves; to the extent that the paraphrase conflicts with the actual wording or meaning of the documents, it is denied. By way of further answer, the debtor may either enter into a loan modification or obtain special counsel to contest the validity of the mortgage.
5. Admitted that documents were filed with the Bankruptcy Court; however, this paragraph paraphrases portions of documents, which are attached to as an exhibit to the Motion and which speak for themselves; to the extent that the paraphrase conflicts with the actual wording or meaning of the documents, it is denied.
4. This paragraph is a conclusion of law to which no answer is necessary; to the extent that an answer is deemed necessary, it is denied.
5. The Debtor lacks knowledge or information sufficient to form a belief as to the truth of this averment, and therefore denies the same.

6. Admitted that the filing of a bankruptcy petition acts as a stay upon certain foreclosure actions.
7. Admitted that the Debtor has not made post-petition payments.
8. Admitted that the Debtor has not made post-petition payments; however, the debtor may either enter into a loan modification or obtain special counsel to contest the validity of the mortgage.
9. This paragraph is a conclusion of law to which no answer is necessary; to the extent that an answer is deemed necessary, it is denied.

WHEREFORE, the Debtor respectfully requests that this Court deny the motion for relief filed by the Movant and grant such other relief as this Court deems just.

Respectfully submitted,

/s/ Kara K. Gendron
Kara K. Gendron, Esquire
Attorney ID 87577
Mott & Gendron Law
125 State Street
Harrisburg, PA 17101
(717) 232-6650 TEL
(717) 232-0477 FAX
karagendron@gmail.com